

OGDEN LONG DISTANCE SERVICE, INC

Annual 47 CFR 64.2009(e) CPNI Certification EB Docket No. 06-36

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Suite TW-A325
Washington, D.C. 20554

**Re: Annual CPNI Compliance Certificate
OGDEN LONG DISTANCE SERVICE, INC
825387**

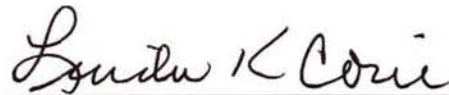
Dear Secretary Dortch,

In accordance with 47 CFR 64.2009(e), please find attached the Company's Annual Compliance Certificate for the previous calendar year, 2015. The Compliance Certificate includes the Company's:

- Statement explaining how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

If you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,



Linda K. Corie

2-15-2016

Date

Enclosure

cc via e-mail: Best Copy and Printing, Inc., FCC@BCPIWEB.COM

5. The Company has established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

6. Company personnel make no decisions regarding CPNI without first consulting with management.

7. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

8. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

9. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

10. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Company will notify the Customer of his or her right to restrict use of, disclosure of, and access to, his or her CPNI.

11. The Company maintains records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

12. The Company trains its personnel for compliance with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods for telephone access, online access, and in-store access to CPNI, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or "pre-texters." In-store visits require valid photo identification.

13. The Company, on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains company personnel accordingly.

Explanation of Actions Against Data Brokers

14. The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

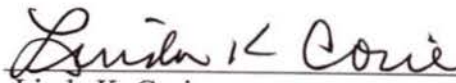
Summary of all Customer Complaints Received

15. The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None

16. The Company does not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.

The company represents and warrants that this certification is consistent with 47 CFR 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Date: 2-15-2016


Linda K. Corie